

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION

UNITED STATES OF AMERICA, * *

v. * CASE NO. 2:05-CR-131-A

WILLIE JAMES BOSWELL, *

Defendant. *

DEFENDANT, WILLIE BOSWELL'S, MOTION
REQUESTING PRETRIAL DISCLOSURE OF
DEMONSTRATIVE EVIDENCE

The Defendant, Willie James Boswell, by and through counsel, in order to expedite the presentation of evidence and avoid unnecessary delay as a result of objections, moves for a pretrial order requiring the disclosure of any demonstrative evidence to be used by the United States.

Mr. Boswell and others are charged in a multi-count indictment alleging conspiracy to possession with intent to distribute 500 grams or more of cocaine, possession of marijuana, and possession of a firearm during a drug trafficking crime.

The Defendant believes that it is likely that demonstrative evidence (for example, charts, diagrams and photographs) will be used by the government in the presentation of its evidence. In order to avoid objections to the content of the demonstrative evidence, the Defendant requests that prior to the demonstrative evidence presentation at trial all parties be allowed to inspect and review the exhibits.

WHEREFORE, the Defendant, Willie Boswell, respectfully requests pretrial disclosure of demonstrative evidence to be used by the government.

/S/ Benjamin E. Pool
BENJAMIN E. POOL (POO008)

OF COUNSEL:
BENJAMIN E. POOL
Post Office Box 2247
Montgomery, Alabama 36102-2247
(334) 265-3528
(334) 263-2428 FAX

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document has been served upon the following by placing a copy of same in the United States Mail, postage prepaid and properly addressed on this the _____3rd____ day of August, 2005.

United States Attorney
Post Office Box 197
Montgomery, Alabama 36101-0197

Honorable Christine A. Freeman
Federal Defenders Office
201 Monroe Street, Suite 407
Montgomery, Alabama 36104

Honorable Zachary T. Collins
207 Montgomery Street, Suite 215
Montgomery, Alabama 36104

/S/ Benjamin E. Pool
BENJAMIN E. POOL